

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CASE NO. 21-31948 (MI)

§ **DEBTOR: WASHINGTON**
§ **PRIME GROUP INC., et al.¹**
§ **DEBTOR: WASHINGTON**
§ **PRIME GROUP INC., et al.²**
§ **JUDGE: MARVIN ISGUR**
§ **COURTROOM DEPUTY:**
§ **TYLER LAWS**

WITNESSES:

- 1. David Plastino, The Brattle Group**
- 2. Any authorized representative of the Debtor**
- 3. Any fact or expert witness called by any other Party**
- 4. Mark Yale, Chief Financial Officer, Washington Prime Group Inc.**
- 5. Louis Conforti, Chief Executive Officer and Director, Washington Prime Group Inc.**
- 6. Mr. Robert Laikin, Chairman of the Board of Directors, Washington Prime Group Inc.;**
- 7. Any witness listed by any other party;**
- 8. Any rebuttal or impeachment witness.**

§ **ATTY'S NAME: Rakhee V. Patel**
§ **ATTY'S PHONE: (214) 745-5250**
§ **TEXAS BAR NO.: 00797213**
§ **DATE: SEPTEMBER 3, 2021**
§ **NATURE OF PROCEEDING:**
§ **DISLCOSURE STATEMENT**
§ **AND PLAN**

WITNESS AND EXHIBIT INDEX

¹ A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.primeclerk.com/washingtonprime>. The Debtors' service address is 180 East Broad Street, Columbus, Ohio 43215.

² A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.primeclerk.com/washingtonprime>. The Debtors' service address is 180 East Broad Street, Columbus, Ohio 43215.

EX. NO.	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	D A F T E R S P O R S I T I O N L
1.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 161]						
2.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 162]						
3.	Additional Attachments Re: <i>Exhibit D to the Disclosure Statement - Liquidation Analysis</i> [Docket No. 218]						
4.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 323]						
5.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 325]						
6.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 334]						
7.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 335]						
8.	Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the (A) Solicitation Procedures, (B) Forms of Ballots and Notices in Connection Therewith, (C) Equity Rights Offering Procedures and Related Materials, and (E) Combined Hearing and Equity Rights Offering Timelines, and (III) Granting Related Relief, Signed on 7/12/2021 [Docket No. 337]						

EX. NO.	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	D A F T E R S U P P O R T I T I O N A L
9.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 338]						
10.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 339]						
11.	Notice of Rescheduled Combined Hearing to Approve the Disclosure Statement and Confirm the Plan and Related Dates. Filed by Washington Prime Group Inc. [Docket No. 716]						
12.	Notice of Filing of Plan Supplement [Docket No. 876]						
13.	First Amended Chapter 11 Plan Filed by Washington Prime Group Inc. [Docket No. 893]						
14.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 894]						
15.	Amended Chapter 11 Plan Filed by Washington Prime Group Inc. [Docket No. 909]						
16.	Notice of Disclosure Statement Supplement Relating to the First Amended Joint Chapter 11 Plan of Reorganization of Washington Prime Group Inc., and its Debtor Affiliates. Filed by Washington Prime Group Inc. [Docket No. 914]						

EX. NO.	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	D A F T S T E P O R S I T R I O N L
17.	Order (I) Approving the Debtors' Continued Solicitation of the Plan, (II) Conditionally Approving the Adequacy of the Supplemental Disclosure Statement, (III) Approving the Modified Equity Option Procedures, the Common Equity Rights Offering Procedures, and Related Materials, (IV) Modifying Certain Confirmation and Equity Rights Offering Deadlines, and (V) Granting Related Relief, Signed on 8/25/2021 [Docket No. 917]						
18.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 928]						
19.	Any exhibits designated by any other parties in interest						
20.	Any pleadings, reports, exhibits, transcripts, Court orders, or other documents filed in the Debtor's bankruptcy case						
21.	Any impeachment or rebuttal exhibits						

Mountain Special Situations Fund, LLC, Clear Harbor Asset Management, LLC, and Invictus Global Management, LLC reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the hearing and/or in compliance with the Bankruptcy Local Rules and the Orders of this Court. Mountain Special Situations Fund, LLC, Clear Harbor Asset Management, LLC, and Invictus Global Management, LLC also reserves the right to provide any documents that may be

amended or supplemented in this Exhibit List to opposing counsel and to this Court as they become available.

DATED: September 1, 2021.

Respectfully submitted,

WINSTEAD PC

By: /s/ Rakhee V. Patel

Rakhee V. Patel

Texas Bar No. 00797213

S.D. Tex. No. 23571

Phillip Lamberson

Texas Bar No. 00794134

S.D. Tex. No. 25823

Jason Enright

Texas Bar No. 24087475

S.D. Tex. No. 3037852

Annmarie Chiarello

Texas Bar No. 24097496

S.D. Tex. No. 2936034

500 Winstead Building

2728 N. Harwood Street

Dallas, Texas 75201

Telephone: (214) 745-5400

Facsimile: (214) 745-5390

achiarello@winstead.com

- and -

WINSTEAD PC

Yasmin Atasi

Texas Bar No. 10435150

Sean B. Davis

Texas Bar No. 24069583

S.D. Tex. No. 1048341

Steffen Sowell

Texas Bar No. 24107926

S.D. Tex. No. 3599931

600 Travis Street

Suite 5200

Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400
E-mail: yatasi@winstead.com
E-mail: sbdavis@winstead.com
E-mail: ssowell@winstead.com

**ATTORNEYS FOR MOUNTAIN
SPECIAL SITUATIONS FUND, LLC,
CLEAR HARBOR ASSET
MANAGEMENT, LLC, AND INVICTUS
GLOBAL MANAGEMENT, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2021, a true and correct copy of the foregoing was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case.

/s/ Annmarie Chiarello
One of Counsel

4853-1016-9081v.3 999993-1